

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NEW YORK
BUFFALO DIVISION

WILLIAMS ADVANCED MATERIALS,
INC.,

Plaintiff,

-v.-

TARGET TECHNOLOGY COMPANY,
LLC,

*Defendant and
Third-Party Plaintiff,*

-v.-

CINRAM INTERNATIONAL, INC.,
individually and as successor in interest to
Warner Advanced Media Operations and
WEA Manufacturing, CDI MEDIA, INC.,
DELUXE MEDIA SERVICES, INC.,
EVATONE, INC., HIGH SPEED VIDEO,
INC., INTERNATIONAL DISC
MANUFACTURER, INC., JVC DISC
AMERICA COMPANY, LIGHTNING
MEDIA, NATIONAL FILM
LABORATORIES d/b/a CREST
NATIONAL OPTICAL STORAGE MEDIA,
REPLITECH, INC., SYMCON,
TAPEMATIC USA, and TAKASAKI CORP.
OF AMERICA,

Third-Party Defendants.

Civil Action Nos.

1:03-cv-00276-RJA-JJM

1:03-cv-00280-RJA-JJM

1:09-cv-00096-RJA-JJM

CINRAM INTERNATIONAL INC.'S JOINDER IN THE WILLIAMS PARTIES'
SUPPLEMENTAL MEMORANDUM OF LAW IN SUPPORT OF THEIR
MOTION TO DISMISS AND FOR SANCTIONS

Third-Party Defendant Cinram International Inc., (“Cinram”), hereby joins in the Williams Parties’¹ Supplemental Memorandum of Law In Support Of Their Motion To Dismiss And For Sanctions, which was filed today, September 28, 2009 (Dkt#342).

WHEREFORE, for the reasons more fully stated in the papers submitted by the Williams Parties, Cinram respectfully requests that the Court dismiss Target’s claims against Cinram for infringement with prejudice, award Cinram its attorneys’ fees and costs incurred in the defense of this lawsuit, together with such other and further relief as this Court deems just and proper.

DATED: September 28, 2009

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Cinram International Inc.

¹ The Williams Parties hereinafter refers to Plaintiff Williams Advanced Materials, Inc. and Third-Party Defendants Deluxe Media Services, Inc., High Speed Video, Inc., International Disc Manufacturer, Inc., JVC Disc America Company, National Film Laboratories d/b/a Crest National Optical Storage Media, Replitech, Inc., Symcon, Tapematic USA, and Takasaki Corp. of America.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on September 28, 2009, the foregoing **CINRAM INTERNATIONAL INC.'S JOINDER IN THE WILLIAMS PARTIES' SUPPLEMENTAL MEMORANDUM OF LAW IN SUPPORT OF THEIR MOTION TO DISMISS AND FOR SANCTIONS** was filed using the CM/ECF system. Notice of this filing will be sent to the following counsel of record for the interested parties by operation of the Court's electronic filing system:

<p>Douglas J. Nash John D. Cook HISCOCK & BARCLAY LLP One Park Place 300 South State Street Post Office Box Syracuse, New York 13202 (315) 425-2828 (Telephone) (315) 703-7364 (Facsimile) dnash@hiscockbarclay.com (email) jcook@hiscockbarclay.com (email)</p> <p style="text-align: center;">and</p> <p>Ronald S. Kareken Christopher E. Blank Thomas B. Cronmiller HISCOCK & BARCLAY LLP 2000 HSBC Plaza 100 Chestnut Street Rochester, New York 14604 (585) 325-7570 (Telephone) (585) 325-5458 (Facsimile) rkareken@hiscockbarclay.com (email) cblank@hiscockbarclay.com (email) tcronmiller@hiscockbarclay.com (email)</p>	<p>Attorneys for Plaintiff/Third Party Defendants WILLIAMS ADVANCED MATERIALS, INC.; DELUXE MEDIA SERVICES, INC.; EVATONE, INC.; HIGH SPEED VIDEO, INC.; INTERNATIONAL DISC MANUFACTURER, INC.; JVC DISC AMERICA COMPANY; NATIONAL FILM LABORATORIES D/B/A CREST NATIONAL OPTICAL STORAGE MEDIA; REPLITECH, INC.; SYMCON, TAPEMATIC USA; and TAKASAKI CORP. OF AMERICA</p>
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s/ Tonia A. Sayour/
Tonia A. Sayour